

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WISCONSIN P5:05

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS HARRISON, and
TODD CARTER, a/k/a "TUT", a/k/a "KING TUT",

Defendants.

Case No. 09-CR-

09 CR-053

[18 U.S.C. §371, Conspiracy;
§1591, Sex Trafficking of a Child;
2423(a), Transporting a Child to
Engage in Prostitution]

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy To Sex Traffic in Children)

The Conspiracy And Its Objective

1. Beginning sometime in March 2008 and continuing through about August 2008, in the State and Eastern District of Wisconsin and elsewhere,

**NICHOLAS HARRISON
and
TODD CARTER,
a/k/a "TUT", a/k/a "KING TUT"**

did knowingly and intentionally conspire to recruit, entice, harbor, transport, provide, and obtain by any means, female children, in and affecting interstate and foreign commerce, knowing that the female children had not attained the age of 18 years and

would be caused to engage in a commercial sex act, in violation of Title 18, United States Code, § 1591.

Manner And Means Of The Conspiracy

It was part of the conspiracy that:

2. CARTER and HARRISON used a house at 2336 N. 1st Street as their residence and as a dwelling for harboring minor (under 18 years of age) females and other young women who were involved in prostitution for the financial benefit of the defendants.

3. HARRISON recruited minor females as his girlfriends and then CARTER introduced them to prostitution as a way for the minor girls to make money.

4. CARTER took suggestive, partially nude, and pornographic photos of the minor females and other young women and then copied those photos to his computer at the residence.

5. CARTER and HARRISON posted the suggestive and partially nude photos of the minor females and other young women with "erotic services" advertisements on the internet website <craigslist.org> and posted the phone numbers of the females as the contact number.

6. CARTER instructed the minor females and other young women to charge their prostitution clients \$200 for "full service," meaning penis to vagina intercourse, and \$150 for "half service," meaning sex acts that did not involve penis to vagina intercourse.

7. In order to prove that the customer was not a police officer, CARTER instructed the minor females and other young women to tell the customer, "show yourself," meaning that the customer had to expose his genitals to the minor female.

8. Once a customer called the minor female or other young women, CARTER or HARRISON, or both, using cars rented by CARTER, would drive the female to an agreed upon motel or the customer's house and then wait for the female until the prostitution activity was finished. Both defendants instructed the minor females to call them on their cell phones to notify them when to meet with the minor female.

9. CARTER and HARRISON required the minor females and other young women to turn over proceeds they received from engaging in prostitution to the defendants.

10. Both CARTER and HARRISON compelled the minor females and other young women through threats of harm, deception, false promises and coercion to engage in prostitution in Wisconsin and elsewhere;

Overt Acts In Furtherance Of The Conspiracy

In furtherance of the conspiracy, the defendants HARRISON and CARTER, committed and caused to be committed the following acts, among others:

11. Between July 2007 and August 2008, CARTER rented 19 different cars from Budget Rent A Car.

12. In April 2008, HARRISON posted an advertisement in the "erotic services" section of <craigslist.org> offering the services of a minor female.

13. In April 2008, CARTER told a minor female that she should quit her job at Burger King in order to devote more time to her prostitution activities.

14. At various times, CARTER advised the minor females to insert baby wipes into their vaginas when they were in their menstrual cycle so that they could continue to engage in prostitution during those periods.

15. On May 15, 2008, HARRISON physically assaulted a minor female after she failed to call him following her prostitution date.

16. In June 2008, CARTER took pictures of the minor females and other young women and posted them to <craigslist.org> for the purpose of soliciting prostitution dates for the minor females.

17. On June 19, 2008, HARRISON and CARTER drove a minor female to a motel in West Allis, Wisconsin for a prostitution date.

18. On or about July 3, 2008, CARTER, while in Des Moines, Iowa, made or caused another to make a posting to <craigslist.org> advertising the erotic services of a minor female he transported to Des Moines for the purpose of prostitution.

19. On or about July 22, 2008, CARTER posted an advertisement in the "erotic services" section of <craigslist.org> offering the services of a female using the name "Sparkle."

20. On July 23, 2008, CARTER drove a minor female to a motel in Greenfield, Wisconsin for a prostitution date.

21. In late July or early August 2008, CARTER threatened a young woman who had engaged in acts of prostitution for his financial benefit that if she gave the police information about his criminal activities he would "get" her and that "I know where your mom and grandma live. I will blow up your grandma's house."

22. As additional overt acts, the grand jury incorporates the conduct included and charged in Counts Two through Six of this Indictment.

All in violation of Title 18 United States Code, Section 371.

COUNT TWO
(Sex Trafficking of a Child)

THE GRAND JURY FURTHER CHARGES:

1. The Grand Jury realleges paragraphs 1 through 22 of Count One and incorporates the same by reference.

2. From on or about April 1, 2008 through on or about June 30, 2008, in the Eastern District of Wisconsin and elsewhere,

NICHOLAS HARRISON
and
TODD CARTER,
a/k/a "TUT", a/k/a "KING TUT"

aided and abetted by each other, knowingly, and in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, and obtain by any means, Child Female #1, and did benefit, financially and by receiving a thing of value, knowing that Child Female #1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591 & 2.

COUNT THREE
(Sex Trafficking of a Child)

THE GRAND JURY FURTHER CHARGES:

1. The Grand Jury realleges paragraphs 1 through 22 of Count One and incorporates the same by reference.
2. From on or about June 1, 2008 through on or about July 31, 2008, in the Eastern District of Wisconsin and elsewhere,

NICHOLAS HARRISON
and
TODD CARTER,
a/k/a "TUT", a/k/a "KING TUT"

aided and abetted by each other, knowingly, and in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, and obtain by any means, Child Female #2, and did benefit, financially and by receiving a thing of value, knowing that Child Female #2 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591 & 2.

COUNT FOUR
(Sex Trafficking of a Child)

THE GRAND JURY FURTHER CHARGES:

1. The Grand Jury realleges paragraphs 1 through 22 of Count One and incorporates the same by reference.
2. From on or about April 1, 2008 through on or about July 31, 2008, in the Eastern District of Wisconsin and elsewhere,

NICHOLAS HARRISON
and
TODD CARTER,
a/k/a "TUT", a/k/a "KING TUT"

aided and abetted by each other, knowingly, and in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, and obtain by any means, Child Female #3, and did benefit, financially and by receiving a thing of value, knowing that Child Female #3 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591 & 2.

COUNT FIVE
(Transporting a Child To Engage In Prostitution)

THE GRAND JURY FURTHER CHARGES:

1. The Grand Jury realleges paragraphs 1 through 22 of Count One and incorporates the same by reference.
2. From on or about July 1, 2008 through on or about July 3, 2008, in the Eastern District of Wisconsin and elsewhere,

TODD CARTER,
a/k/a "TUT", a/k/a "KING TUT"

knowingly transported Female Child #1, who had not at that time attained the age of 18 years, in interstate commerce from Wisconsin to Iowa, with intent that Female Child #1 engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2423(a) and 2.

COUNT SIX
(Transporting a Child To Engage In Prostitution)

THE GRAND JURY FURTHER CHARGES:

1. The Grand Jury realleges paragraphs 1 through 22 of Count One and and incorporates the same by reference.
2. From on or about July 1, 2008 through on or about July 3, 2008, in the Eastern District of Wisconsin and elsewhere,

TODD CARTER,
a/k/a "TUT", a/k/a "KING TUT"

knowingly transported Female Child #3, who had not at that time attained the age of 18 years, in interstate commerce from Wisconsin to Iowa, with intent that Female Child #3 engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Sections 2423(a) and 2.

A TRUE BILL:


FOREPERSON

Dated: 2/24/09



MICHELLE L. JACOBS
Acting United States Attorney